

Exhibit

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Attorneys for PLAINTIFF
RENALDO NAVARRO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RENALDO NAVARRO,

Plaintiff,

vs.

MENZIES AVIATION, INC., doing
business as MENZIES and DOES 1 through
10, inclusive.

Defendants.

Case No.: 3:10-cv-08157 VC

**DECLARATION OF MODESTO COMPAS
IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO SUMMARY JUDGMENT**

Date: November 19, 2020
Time: 10:00 a.m.
Place: video conference link

Hon. Vince Chhabria
San Francisco Courthouse
Courtroom 4 – 17th Floor

Action Removed: December 16, 2019
Action Filed: October 23, 2019

1 I, Modesto Compas, have personal knowledge of the matters stated herein and if called
2 upon as a witness, I would competently testify as follows:

3 1. I started working at ASIG since 2015, as a fueler, until the company was bought
4 by Menzies Aviation, Inc. ("Defendant"). I continue to work for Defendant.

5 2. I signed the petition against Andrew Dodge because I believe he is not doing a
6 good job at Menzies. I still can't believe that instead of demoting Mr. Dodge the company fired
7 Mr. Navarro. It was the union stewards, Jenzen, Mark and others who were the ones working to
8 put together the petition. I remember they were working on it for some time until they started
9 getting signatures.

10 3. I never saw Mr. Navarro pressure others, nor ask others to sign the petition.

11 4. Mr. Navarro is a good employee. Loyal to the company with the company's
12 interest in mind. He only wanted what was good for the fuelers and the company. Harmonious
13 work.

14 5. Almost all of the fuelers signed the petition and yet they still did not do anything
15 to Mr. Dodge. I truly believe that had a Filipino supervisor was subject to even just 5 people
16 complaining, the company would fire the Filipino supervisor. Mr. Dodge is favored in the
17 company over the Filipinos because he is white. This is my opinion.

18 6. I have seen Filipinos getting reprimands for far less than what Mr. Dodge does at
19 the job. I have seen him sleeping at the job. I have seen him sleeping in the tarmac. Management
20 knows this. It is common knowledge. It is embarrassing to the other companies and airlines.
21 This is dangerous. Yet, nothing happens to him.

22 7. I know that fuelers kept telling the union stewards in 2017 and 2018 that Mr.
23 Dodge was causing meal breaks being missed, delays in schedules and plane delays. Nothing
24 happened. This is why we asked for help from Mr. Navarro.

25 I declare under penalty of perjury under the laws of the United States and in the State of California
26 that the foregoing is true and correct.

27
28 
Modesto Compas

10/31/2020

Date

Document ID: W6J5J3KL

andrea@liberationlawgroup.com

Nombre del documento:

Declaration of Modesto Compas.pdf

Función hash de seguridad SHA256:

9cfd6134d95f991276dd26437f46a6ab4e4bb1a7d07d8e7f0864631a58e8042a

Enviado el:

31 de Octubre de 2020 a las 22:17 (UTC)

De:

SignRequest <no-reply@signrequest.com> on behalf of
(andrea@liberationlawgroup.com)

A:

mcompas97@gmail.com

Sujeto:

andrea@liberationlawgroup.com le ha enviado una solicitud
de firma SignRequest

Mensaje:

Dear Mr. Compas:

Please sign and date where indicated. Should you have questions or concerns, please contact me at
andrea@liberationlawgroup.com. Thank you.

Sincerely,

Andrea Ortiz

Dirección IP:

71.202.210.109

Agente de usuario:

Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/
537.36 (KHTML, like Gecko) Chrome/86.0.4240.111 Safari/
537.36

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Texto añadido, página 2:

10/31/2020

Firma añadida, página 2:

Modesto Compas

Dirección IP:

107.77.211.31

Agente de usuario:

Mozilla/5.0 (iPhone; CPU iPhone OS 14_0_1 like Mac OS X)
AppleWebKit/605.1.15 (KHTML, like Gecko) Version/14.0
Mobile/15E148 Safari/604.1

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